

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ALL CASES INCLUDING WAVE 1 AND ANY FUTURE WAVE CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**AMENDED CROSS-NOTICE OF VIDEOTAPED *DE BENE ESSE*
DEPOSITION OF BRUCE ROSENZWEIG, MD**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the *de bene esse* testimony of Bruce Rosenzweig, MD will be taken jointly in connection with In Re: Pelvic Mesh Litigation, February Term 2014, No. 829, Philadelphia County Court of Common Pleas, Civil Trial Division and Cederberg-Ebaugh v. Ethicon, Inc., et al., July Term 2013, No. 00866, Philadelphia County Court of Common Pleas, Civil Trial Division, upon oral examination on July 14, 2017 and July 15, 2017 at 9:00 a.m. at JW Marriott Chicago, 151 W Adams St, Chicago, IL 60603. The notice of deposition is attached hereto as Exhibit A.

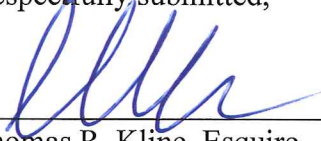
PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, and the procedures set forth In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327, Plaintiffs hereby cross-notice this testimony for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Plaintiffs further state that this

trial examination shall be conducted in accordance with and subject to the Protective Orders entered In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327.

This videotaped trial examination will be taken before a person authorized by law to administer oaths and be recorded by stenograph.

Dated: June 26, 2017

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'TKline', is written over a horizontal line.

Thomas R. Kline, Esquire
Shanin Specter, Esquire
Lee B. Balefsky, Esquire
Christopher A. Gomez, Esquire
KLINE & SPECTER, PC
1525 Locust Street
Philadelphia, PA 19102
(215) 772-1000
(215) 735-0960 (fax)
E-mail: lee.balefsky@klinespecter.com
E-mail: chris.gomez@klinespecter.com